UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20245-MD

UNITED STATES OF AMERICA

VS.

OMAR CABRERA HERNANDEZ,

Defendant.		

UNITED STATES' MOTION FOR REDUCTION OF SENTENCE

Pursuant to United States Sentencing Guidelines ("USSG") Section 5K1.1 and Title 18, United States Code, Section 3553(e), the United States of America, by and through the undersigned Assistant United States Attorney, hereby files this written motion for a sentence reduction of the defendant listed above in order to reflect his substantial assistance in the investigation and prosecution of others. In support of this motion, the Government states as follows:

- 1. At the January 21, 2025 sentencing hearing, an oral motion was made by undersigned counsel in Court.
- 2. Based on the facts of this case, as the undersigned counsel detailed at the sentencing hearing, the defendant's assistance warrants a reduction in his sentence pursuant to USSG § 5K1.1 and 18 U.S.C. § 3553(e).
- 2. Accordingly, the United States respectfully made an oral motion to this Court for a reduction in the sentence of the defendant listed above.

The Defendant's counsel did not oppose the motion at the hearing but requested that the Court grant a greater sentence reduction.

WHEREFORE the United States respectfully files this written motion, as a housekeeping matter only, to formalize his oral motion made in Court.

Respectfully submitted,

MICHAEL S. DAVIS **ACTING UNITED STATES ATTORNEY**

By: /s/ Timothy J. Abraham Dated: January 21, 2025

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF on January 21, 2025, and a copy was provided to all counsel of record by that means.

> /s/ Timothy J. Abraham Assistant United States Attorney